



# SUPERIOR PRODUCTS INTERNATIONAL II, INC.

May 10, 2005

Bill Pennington  
California Energy Commission  
Sacramento, CA

Mr. Pennington,

Pursuant to communications with Elaine Hebert, I am writing in regard to the dry mil thickness requirement for roof coatings listed in Title 24. This currently requires a coating to be applied at a dry mil thickness of 20 dry mils.

The coating our company manufactures (SUPER THERM) is applied at 16 mils wet and dries to a thickness of 10 dry mils. It has performed in the field at this thickness for up to 15 years and additionally has had a variety of salt-spray, weathering, boiling, and aging tests done in the past to prove its endurance. We also provide a standard warranty for 10 years.

We have recently received an independent study from Japan stating that the performance of our product has not changed after comparing current test data to testing 10 years prior. Our Japanese distributor (Daiko Shokai) has applied millions of square meters of our product in Japan, and COOL THERM owns over 70% of the total market share for roof coatings. (COOL THERM is the private label name used in Japan) Some of their current customers are Sony, Mitsubishi, and Panasonic to mention a few, and Daiko has just completed a 2 million square foot multiple roofing application for Nissan Automotive.

Along with this letter, you are receiving documents supporting the claims made above. It is our desire that you recognize that our product is durable and continues to perform at the current designated 10 dry mil thickness for many years. We have found that adding additional product is not necessary and that it does not improve the performance of our coating. Requiring 20 dry mils would only result in doubling the cost of the product and labor costs to the end user. I appreciate your time and consideration.

Sincerely yours,

Cc: Elaine Hebert

SUPERIOR PRODUCTS INTERNATIONAL II, INC.

By: \_\_\_\_\_

Craig R. Smith  
Technical Director